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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
JULIAN SANTIAGO, and SUSAN LYNN
HARVEY individually and on behalf of all
other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF RYAN MCGEE IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF MOTION FOR CLASS
CERTIFICATION**

Judge: Hon. Richard Seeborg
Courtroom 3 – 17th Floor
Date: October 5, 2023
Time: 1:30 p.m.

DECLARATION OF RYAN MCGEE

I, Ryan McGee, declare as follows.

1. I am an associate with the law firm of Morgan and Morgan, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida and admitted *pro hac vice* for this case. Dkt. 13. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5, I submit this Declaration in support of Plaintiffs' administrative motion to seal portions of their motion for class certification. In making this request, Plaintiffs have carefully considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.

3. Plaintiffs respectfully request that the Court seal:

- a. Portions of paragraphs 149, 152, 182, 191, 192, 244, and 246, as well as portions of Appendix K of the March 22, 2023 Expert Report of Jonathan Hochman ("Hochman Report"), which contain information related to the Plaintiffs, including unique identifiers, contact information, location, and private app activity.
- b. The entirety of Appendices A, B.1, B.2, C, and K of the Hochman Report, which contain information related to the Plaintiffs, including unique identifiers.
- c. Portions of Exhibit 20 to the Declaration of E. Santacana in Opposition to Plaintiffs' Motion for Class Certification, which contain information concerning a minor who is a non-party to this litigation.
- d. Portions of Exhibit 6 to the Declaration of E. Santacana in Support of Google's Motion to Exclude the Opinions of Michael J. Lasinski, which contain information concerning Ms. Harvey's home address, email addresses, and banking institutions.

4. The information requested to be sealed is being designated by Plaintiffs as "Confidential" pursuant to the parties' Stipulated Protective Order (Dkt. 70).

